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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

**Plaintiff,**

v.

CHRISTOPHER BERCIER, and

### Defendants.

2:23-CR-70-MKD-2

## INDICTMENT

18 U.S.C. §§ 922(g)(1), 924(a)(8),  
Felon in Possession of Firearms  
(Count 1)

18 U.S.C. §§ 922(j), 924(a)(2)  
Possession of Stolen Firearms  
(Count 2)

18 U.S.C. § 933(a)(1), (a)(3), (b)  
Firearms Trafficking  
(Count 3)

18 U.S.C. § 924, 18 U.S.C. § 934,  
28 U.S.C. § 2461(c)  
Forfeiture Allegations

## The Grand Jury charges:

As to Counts 1 - 3 set forth below, the following firearms are hereby alleged:

- U.S. Springfield Armory Model 1898 .30 caliber rifle bearing serial number 251753:

- 1        – U.S. Property Enfield Model No. 4 MK1 .303 caliber rifle bearing  
2                  serial number 0C47730;
- 3
- 4        – Russian Mosin-Nagant Sporterized Carbine Model 91 7.62 x 54 mm  
5                  caliber bolt-action rifle bearing serial number 34559;
- 6
- 7        – National Ordnance Model 1903A3 .30-06 caliber bolt-action rifle  
8                  bearing serial number 5006999;
- 9
- 10      – U.S. Rock Island Model 1903 .30-06 caliber bolt-action rifle bearing  
11                 serial number 430573;
- 12
- 13      – Marlin Model 336A .32 special caliber lever-action rifle bearing serial  
14                 number F28096;
- 15
- 16      – Long Branch Model No. 4 MK1 .303 British caliber rifle bearing  
17                 serial number 83L9225;
- 18
- 19      – Remington Arms Co. Woodmaster Model 742 .30-06 caliber semi-  
20                 automatic rifle bearing serial number 38214;
- 21
- 22      – Remington Arms Co. Union Metallic CTG. Model 11 12 gauge  
23                 shotgun bearing serial number 249130;
- 24
- 25      – US Carbine Model 11 .30 caliber with synthetic stock bearing serial  
26                 number 2203494;
- 27
- 28      – Winchester Model 250 .22 caliber rifle bearing serial number 757019;  
– Winchester Model 290 .22 caliber rifle bearing serial number  
B882285;  
– Remington Arms Co. Model 8 .35 caliber rifle bearing serial number  
F23868;  
– The Marlin Firearms Co. Papoose Model 70P .22LR caliber rifle  
bearing serial number 124414455;

- Harrington & Richardson, Inc. Topper Model 158 30-30 caliber rifle bearing serial number AM289324;
- Winchester Model 320 .22 caliber rifle bearing serial number D24216;
- Italian Caranco Carbine 6.5 x 52mm caliber rifle bearing serial number SQ4585;
- Russian Mosin-Nagant Carbine Model 1891/59 7.62 x54Rmm caliber rifle bearing serial number 1KH9198;
- Russian Mosin-Nagant Carbine Model 91/30 7.62 x54R caliber rifle bearing serial number EM712;
- CZ-VZ24 Model 98 8mm mauser caliber rifle bearing serial number TR18997;
- Chilean Model 1912 7.62 Nato caliber bolt-action rifle bearing serial number D512;
- Winchester Model 121 .22 caliber bolt-action rifle bearing serial number Z221146;
- Turkish Model Mauser 98 7.92x57mm caliber bolt-action rifle bearing serial number 181652;
- CZ Model 52 7.62x45mm caliber semi-automatic rifle bearing serial number E37999;
- U.S. Springfield Model 1903 .25-06 caliber bolt-action rifle bearing serial number 1483164;
- Kmart Corporation Model 251 20 gauge shotgun bearing serial number 29050999;
- Saiga Model 308-1 Sporter 7.62x51caliber semi-automatic rifle bearing serial number H03740570;

- 1     – Mossberg Model 800BD .243 winchester caliber bolt-action rifle  
2         bearing serial number 19229B;
- 3
- 4     – J. Stevens Arms & Tool Co. Model Crack Shot .22 caliber rifle  
5         bearing serial number VQ719;
- 6
- 7     – CDM Products Inc. Model CDM .22 caliber revolver bearing serial  
8         number 263409;
- 9
- 10    – Harrington & Richardson Inc. Model 622 .22LR caliber revolver  
11         bearing serial number AZ014317;
- 12
- 13    – Hi Standard Sentinel Model R-103 .22 caliber revoler bearing serial  
14         number 1376291;
- 15
- 16    – Hi Standard Duramatic Model 101 .22LR caliber pistol bearing serial  
17         number 852409;
- 18
- 19    – Ruger Mark II Target .22LR caliber pistol bearing serial number  
20         21532213;
- 21
- 22    – Ruger Model 22/45 Target .22LR caliber pistol bearing serial number  
23         22045026;
- 24
- 25    – Astra Cub .22 short caliber semi-automatic handgun bearing serial  
26         number 92088;
- 27
- 28    – Colt Officers Model .38 special caliber revolver bearing serial number  
       930846;
- 29
- 30    – Hi Standard Double Nine Model W-100 .22 caliber revolver bearing  
31         serial number 866201;
- 32
- 33    – Colt Model Police Positive .38 special caliber revolver bearing serial  
34         number 29894;
- 35
- 36    – Llama Parabellum 9mm caliber semi-automatic handgun bearing  
37         serial number 730685;
- 38

- 1 – Colt Model Army Special 32-30 W.C.F. caliber revolver bearing  
2 serial number 335214;
- 3
- 4 – Manurhin Model PPK/S .380ACP caliber pistol bearing serial number  
5 2630635;
- 6 – Manurhin Model PP 7.65mm caliber pistol bearing serial number  
7 81774;
- 8 – Bond Arms Model Texas Defender .45 colt caliber or 410 shotgun  
9 shell pistol bearing serial number 14566;
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- 11 – Para Ordinance Model P12-45 .45ACP caliber pistol bearing serial  
12 number RJ10899;
- 13 – Imez Model IJ-70-18A 9 x18 mm caliber pistol bearing serial number  
14 H607982;
- 15 – CZ Makarov Model 82 9x18 caliber semi-automatic handgun bearing  
16 serial number 095704;
- 17 – Remington Field Master Model 572 .22 caliber rifle bearing serial  
18 number A1430517;
- 19 – Savage Model 720 12 gauge shotgun bearing serial number 92326;
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- 21 – Marlin Firearms Model 882SS .22 caliber rifle bearing serial number  
22 98702271;
- 23 – Winchester Model 70 .300 win caliber rifle bearing 516733;
- 24
- 25 – National Ord. Inc. U.S. Carbine .30 caliber rifle bearing serial number  
26 7679;
- 27 – Browning Arms Co. .22 caliber rifle beraing serial number 21896T37;
- 28 – Remington Model 12 .22 caliber pump-action rifle bearing serial

1 number 727442;

2 – Remington Model 12 .22 caliber pump-action rifle bearing serial  
3 number 803634;

4 – Winchester Model 62A .22 caliber rifle bearing serial number 207509;

5 – The Marlin Firearms Co. Model Golden 39A .22 caliber rifle bearing  
6 serial number V9720;

7 – Savage Arms Co. Model 1899 .25-.35 caliber rifle bearing serial  
8 number 83664;

9 – Savage Arms Co. Model 1899 30-30 caliber rifle bearing serial  
10 number 81418;

11 – Savage Arms Co. Model 99 250-3000 caliber rifle bearing serial  
12 number 305707; and

13 – U.S. Springfield Armory Model 1903 – Mark I .30-06 caliber bolt-  
14 action rifle bearing serial number 1134952.

16 COUNT 1  
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18 On or about September 9, 2022, in the Eastern District of Washington, the

19 Defendants, [REDACTED] CHRISTOPHER BERCIER, and

20 [REDACTED] each knowing of his or her status as a person previously

21 convicted of a crime punishable by imprisonment for a term exceeding one year,

22 did knowingly and intentionally possess in and affecting commerce the firearms

23 listed above, which firearms had theretofore been transported in interstate and

24 foreign commerce, all in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(8).

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1 COUNT 2  
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3 On or about September 9, 2022, in the Eastern District of Washington, the  
4 Defendants, [REDACTED] CHRISTOPHER BERCIER, and  
5 [REDACTED] did knowingly and intentionally possess stolen firearms  
6 listed above, which had been shipped and transported in interstate commerce,  
7 knowing or having reasonable cause to believe the firearm was stolen, in violation  
8 of 18 U.S.C. §§ 922(j), 924(a)(2).  
9

10 COUNT 3  
11

12 On or about September 9, 2022, in the Eastern District of Washington, the  
13 Defendants, [REDACTED] CHRISTOPHER BERCIER, and  
14 ASHL [REDACTED] did ship, transport, transfer, cause to be transported, or  
15 otherwise dispose of the firearms listed above to others, to include Alejandro Torres  
16 and Edward Salvador, in or otherwise affecting commerce, knowing or having  
17 reasonable cause to believe that the use, carrying, or possession of the firearms by  
18 Alejandro Torres and Edward Salvador would consistute a felony, and did conspire  
19 to do so, in violation of 18 U.S.C. § 933(a)(1), (a)(3), (b).  
20

21 NOTICE OF FORFEITURE ALLEGATIONS  
22

23 The allegations contained in this Indictment are hereby re-alleged and  
24 incorporated herein by this reference for the purpose of alleging forfeitures.  
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Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction  
of an offense(s) in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(8); and/or 18 U.S.C.  
§§ 922(j), 924(a)(2); and/or 18 U.S.C. § 933, by way of 18 U.S.C. § 934(B), as set  
forth in this Indictment, Defendants, [REDACTED]

CHRISTOPHER BERCIER, [REDACTED] shall forfeit to the United  
States of America, any firearms and ammunition involved or used in the  
commission of the offense, including, but not limited to:

- Turkish Model Mauser 98 7.92x57mm caliber bolt-action rifle bearing serial number 181652;
- CZ Model 52 7.62x25mm caliber semi-automatic rifle bearing serial number E37999;
- Harrington & Richardson Inc. Model 622 .22LR caliber revolver bearing serial number AZ014317;
- Ruger Model 22/45 Target .22LR caliber pistol bearing serial number 22045026;
- Colt Officers Model .38 special caliber revolver bearing serial number 930846;

Pursuant to 18 U.S.C. § 934, upon conviction of an offense in violation of 18  
U.S.C. § 933, as set forth in this Indictment, Defendants, [REDACTED]

[REDACTED], CHRISTOPHER BERCIER, [REDACTED] shall forfeit to  
the United States of America, any property constituting or derived from any  
proceeds obtained directly or indirectly as a result of the violation and any property

1 used or intended to be used in any manner or party to commit or to facilitate the  
2 commission of such violation.  
3

4 DATED this \_\_\_\_ day of June 2023.

5 A TRUE BILL  
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10 Foreperson  
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13 Vanessa R. Waldref  
14 United States Attorney  
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17 Caitlin Baunsgard  
18 Assistant United States Attorney  
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